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Attorney for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARCUS TURNER, an individual

Plaintiff,

vs.

HARVARD MEDTECH OF NEVADA,
LLC, a Nevada limited liability company;
KULDARSHAN S. PADDA, an individual,

Defendants.

Case No. 2:22-cv-1264-JCM-BNW

**STIPULATION TO PERMIT
DEFENDANTS ADDITIONAL TIME TO
FILE REPLIES**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Plaintiff and Defendants stipulate and agree to permit Defendants additional time, or until February 10, 2023, to file replies to Plaintiff's oppositions to Defendants' motions to stay and for extension. *See* ECF Nos. 36 and 38. This is the parties' first request for an extension of time for the purpose set forth herein. The parties respectfully request the Court approve this stipulation and in support of this request rely upon the following facts:

Defendants' replies to Plaintiff's opposition to Defendants' motions for stay and

extension were due, respectively, on January 27, 2023 and February 6, 2023. However, as Defendant's counsel has explained to counsel for Plaintiff, due to an unfortunate computer error these deadlines, while properly entered, did not get saved to defense counsel's calendaring system. Counsel for Defendant did not become aware of the deadlines until reviewing the Court's docket on February 7, 2023. The calendaring error which resulted in defense counsel missing the deadlines was the result of excusable neglect.

In light of the foregoing, and based upon excusable neglect, the parties respectfully request that the Court approve this Stipulation.

Respectfully submitted,

/s/ Jennifer Braster

/s/ Paul S. Padda


Jennifer Braster, Esq.
Benjamin B. Gordon, Esq.
Alexius Miller, Esq.
Counsel for Plaintiff

Paul S. Padda, Esq.
Counsel for Defendants

Dated: February 9, 2023

Dated: February 9, 2023

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: February 10, 2023